

July 18, 2025

BY ECF

The Honorable Jessica G. L. Clarke
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Kane v. Combs et al.*, 23-cv-10628 (JGLC)

Dear Judge Clarke:

We write on behalf of Defendants Sean Combs and Harve Pierre (“Defendants”) to provide the Court notice of supplemental authority bearing on Defendants’ pending letter motion to stay discovery, ECF No. 85. On July 17, 2025, the court in *Graves v. Combs et al.*, No. 24-cv-07201 (AT), a case involving, among other claims, a claim for violation of New York City’s Victims of Gender-Motivated Violence Protection Law, N.Y.C. Admin. Code §§ 10-1101, *et seq.*, granted, over the plaintiff’s objection, the defendants’ letter motion to stay the matter pending the Second Circuit’s decisions in *Parker v. Alexander*, No. 25-487 and *Doe v. Black*, 25-564. *Graves v. Combs*, No. No. 24-cv-07201 (AT), Order (July 17, 2025), ECF No. 68 (the “Order”). A copy of the Order is attached as Exhibit A.

Respectfully submitted,

/s/ Scott Leemon

Scott Leemon

Counsel for Defendant Harve Pierre

/s/ Erica A. Wolff

Erica A. Wolff

Counsel for Defendant Sean Combs